

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

ADELINA C. ROCABRUNA, *et al.*,

Plaintiffs,

v.

BANK OF AMERICA, N.A.,

Defendant.

Civil Action No. 1:12-cv-00506 (LMB/TCB)

**CONSENT MOTION FOR ENTRY OF A PROTECTIVE ORDER
WITH NO PROSPECTIVE SEALING PROVISIONS**

Defendant Bank of America, N.A. (“BOA”), by counsel and pursuant to this Court’s July 23, 2012 Order and Local Rule 7, and with the consent of Plaintiffs Adelina C. Rocabruna and Miguel A. Rocabruna (the “Rocabrunas”), hereby move this Court to enter the attached Stipulated Protective Order. *The enclosed Stipulated Protective Order does not contain any provisions that implicates the briefing requirements under Local Rule 5(c).*

WHEREFORE, BOA respectfully requests that this Court grant this Consent Motion for Entry of a Protective Order With No Prospective Sealing Provisions, enter the attached Stipulated Protective Order, and award BOA any other relief that it deems just and proper.

Dated: August 17, 2012

Respectfully submitted,

BANK OF AMERICA, N.A.

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CERTIFICATE OF SERVICE

I hereby certify that on the 17th of August, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will then send a notification of such filing (NEF) to the following:

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